



*From the desk of:
Olivia P. Kelly, Esq.*

July 22, 2024

VIA ECF

Hon. Valerie Figueredo
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re. *Gref v. Am. Int'l Indus., et al.*, 20-cv-05589

Dear Judge Figueredo,

In furtherance of Plaintiff's ongoing effort to resolve this matter and conserve judicial resources, Plaintiff withdraws his experts' reliance in this case on Moline, J. et al., "Exposure to Cosmetic Talc and Mesothelioma," *Journal of Environmental Medicine and Toxicology*, Vol. 18, No. 1, January 2023 ("2023 Article"), which remains subject to pending motions. To be clear, this article will no longer play any role in this action. Accordingly, Plaintiff respectfully requests that all pending motions seeking additional discovery with respect to the Article, including non-party Northwell Health's motion to quash the subpoena served by the sole-remaining Defendant in this action, American International Industries, be denied as moot.

We thank the Court for its time and resources devoted to resolving these issues.

Respectfully yours,

Olivia P. Kelly

cc: All Counsel of Record (via ECF)

We stand for our clients.

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